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December 18, 2003

Director Ron Jones Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37243-0505

RE:

Workshop to Gather Information from the Telecommunications Industry

Related to Preventing Violations of Tenn. Code Ann. § 65-21-114

Docket No. 03-00502 Sprint Comments

Dear Director Jones:

Sprint would like to express appreciation to you and to your Policy Advisor, Julie Woodruff, for the excellent documentation and description of history regarding expanded calling within a county in Tennessee as recorded in the Report on Workshop Meeting Held November 7, 2003 and Recommendation of Moderator. This Report will be quite helpful as we move toward resolution of the issues surrounding T.C.A. § 65-21-114.

Sprint agrees with the Moderator's recommendation that two dockets should be convened—a rulemaking proceeding and a generic case proceeding. Sprint supports a rulemaking proceeding to establish a mechanism to be used by all carriers for the purpose of complying with the Statute. It has been Sprint's position that the TAR Code Database could fully meet the provisions of T.C.A. § 65-21-114, but only if all carriers participate in the established procedure for this database.

Regarding the recommendation for a generic contested case, Sprint also supports establishing this proceeding, but would recommend that the contested case be considered after the conclusion of the rulemaking proceeding. Only after the mechanism is established can toll providers determine the cost of that mechanism.

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Finally, Sprint commends the Moderator's direction to the Authority Staff to consider the movement in Tennessee toward a competitive environment as the Staff drafts the proposed rule. Since many of the decisions regarding expanded intra-county calling were made prior to intralata toll and local competition, consideration of the current environment is appropriate.

If you have questions, please contact Laura Sykora (919-554-7323) or Kaye Odum (919-554-5277).

Sincerely,

James B. Wright

C: Laura Sykora Kaye Odum